

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

PLANNED PARENTHOOD CENTER FOR
CHOICE, et al.,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as Governor
of Texas, et al.,

Defendants.

No. 1:20-cv-323-LY

**PLAINTIFF HOUSTON WOMEN’S CLINIC’S MOTION FOR
TEMPORARY RESTRAINING ORDER**

Plaintiff Houston Women’s Clinic recently joined the instant case via Plaintiffs’ Amended Complaint, ECF No. 67, and respectfully seeks a temporary restraining order allowing it to provide medication abortions consistent with the terms of this Court’s Order Granting Plaintiffs’ Second Motion for Temporary Restraining Order. ECF No. 63 (the “Second TRO”); *In re Greg Abbott*, No. 20-50296 (5th Cir. Apr. 13, 2020) (dissolving the previously entered temporary administrative stay as applied to medication abortions).

Plaintiff Houston Women’s Center joins in all legal and factual contentions made by other Plaintiffs to date. As set out in the record; Plaintiffs’ Amended Complaint, ECF No. 67; and the Declaration of Dr. Bernard Rosenfeld in Support of Plaintiffs’ Motion for Temporary Restraining Order, attached hereto as Ex. 1, Plaintiff Houston Women’s Clinic is similarly situated to the other Plaintiffs in this case and accordingly seeks relief from the Court in order to, like the other Plaintiffs, provide medication abortions.

Defendants oppose this motion.

Dated: April 14, 2020

/s/ Patrick J. O'Connell
Patrick J. O'Connell
Texas Bar No. 15179900
Law Offices of Patrick J. O'Connell PLLC
5926 Balcones Dr., Ste. 220
Austin, Texas 78731
(512) 852-5918
pat@pjofca.com

Attorney for Plaintiffs

Anjali Salvador, TX Bar No. 24110324*
Andre Segura, TX Bar No. 24107112*
ACLU FOUNDATION OF TEXAS, INC.
5225 Katy Freeway, Suite 350
Houston, TX 77007
Tel. (713) 942-8146
Fax: (713) 942-8966
asalvador@aclutx.org
asegura@aclutx.org

Brigitte Amiri*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
125 Broad Street, 18th Floor
New York, NY 10004
Tel. (212) 549-2600
Fax: (212) 549-2652
bamiri@aclu.org

Attorneys for Plaintiff Houston Women's Center

*admitted *pro hac vice*

CERTIFICATE OF SERVICE

I certify that on this 14th day of April, 2020, I filed a copy of the foregoing with this Court's CM/ECF system, which will serve a copy on the following individuals:

Heather Gebelin Hacker
Andrew Bowman Stephens
Benjamin S. Walton
Office of the Attorney General of Texas
209 W. 14th Street
7th Floor
Austin, TX 78701
512-836-2540
512-474-2697 (fax)
heather.hacker@oag.texas.gov
andrew.stephens@oag.texas.gov
benjamin.walton@oag.texas.gov

John J. Butrus, Jr.
Dallas County District Attorney's Office
133 N. Riverfront Blvd LB 19
Dallas, TX 75207
(214) 653-3691
(214) 653-2899 (fax)
john.butrus@dallascounty.org

Justin C. Pfeiffer
Fort Bend County Attorney's
Office 401 Jackson Street
Third Floor
Richmond, TX 77469
(281) 341-4555
281-341-4557 (fax)
justin.pfeiffer@fortbendcountytexas.gov

David S. Lill
Lill Firm, P.C.
4407 Bee Caves Road
Suite 111 Building 1
Austin, TX 78746
(512) 330 0252
844 402 9814 (fax)
david@lillfirm.com

Elizabeth Murrill
Louisiana Dept. of Justice
1885 North Third Street
Baton Rouge, LA 70804
225-456-7544
murrille@ag.louisiana.gov

/s/ Patrick J. O'Connell
Patrick J. O'Connell